

DOUGLAS M. MILLER (Cal. Bar No. 240398)  
Email: millerdou@sec.gov  
CHARLES E. CANTER (Cal. Bar No. 263197)  
Email: canterc@sec.gov  
KELLY C. BOWERS (Cal. Bar No. 164007)  
Email: bowersk@sec.gov

Attorneys for Plaintiff  
Securities and Exchange Commission  
Katharine Zoladz, Regional Director  
Brent W. Wilner, Associate Director  
Douglas M. Miller, Regional Trial Counsel  
444 S. Flower Street, Suite 900  
Los Angeles, California 90071  
Telephone: (323) 965-3998  
Facsimile: (213) 443-1904

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

vs.

STEVEN J. SUSOEFF and STEVE  
SUSOEFF, LLC (dba Meritage  
Financial Group),

Defendants.

Case No. 2:23-cv-00173-JCM-EJY

**NOTICE OF PROPOSED  
SETTLEMENT AND STIPULATION  
AND ORDER TO VACATE  
SCHEDULING ORDER**

1 Plaintiff Securities and Exchange Commission and Defendants Steven J.  
2 Susoeff and Steve Susoeff, LLC, through undersigned counsel, stipulate as follows:

3 1. The SEC filed its complaint on February 1, 2023. ECF No. 1.  
4 2. Defendants timely answered on April 6, 2023. ECF. No. 5  
5 3. The Court entered the scheduling order in the case on May 11, 2023.  
6 ECF No. 8.

7 4. On September 13, 2024, the Court approved the parties' stipulation to  
8 modify the scheduling order and continue the deadline for filing the Joint Pre-Trial  
9 Order to October 23, 2024. ECF. No. 26.

10 5. Counsel for the parties have agreed to a settlement in principle of all  
11 claims in this action. As the Court may be aware, only the Commissioners of the SEC  
12 have the final authority to approve any settlement on behalf of the SEC. Accordingly,  
13 before submitting final proposed settlement documents to the Court, SEC counsel  
14 must obtain Commission approval by first submitting an action memorandum to the  
15 Commission setting forth their recommendation and providing a comprehensive  
16 explanation of the recommendation's factual and legal basis. After the  
17 recommendation is presented, the Commission considers the recommendation and  
18 votes on whether to approve or reject the recommendation. *See* SEC DIV. OF ENF'T,  
19 ENFORCEMENT MANUAL §§ 2.5.1-2 (available at  
20 <https://www.sec.gov/divisions/enforce/enforcementmanual.pdf>).

21 6. Counsel for the SEC has begun the process of obtaining authorization to  
22 enter the proposed settlements. Under the present circumstances, that process is  
23 expected to take at least 75 days.

24 7. Accordingly, the scheduling order should be vacated.

25 8. Counsel for the SEC will file either the final settlement documents or a  
26 status report on or before January 10, 2025.

27 IT IS SO STIPULATED.  
28

1 Dated: October 21, 2024

2 /s/ Charles E. Canter  
3 DOUGLAS M. MILLER  
4 CHARLES E. CANTER  
5 *Attorneys for Plaintiff*  
6 *Securities and Exchange Commission*

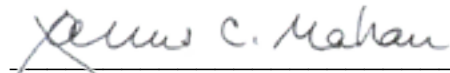
7 Dated: October 21, 2024

8 **FLANGAS LAW GROUP**  
9 /s/ Kimberly P. Stein  
10 KIMBERLY P. STEIN (NBN 8675)  
11 E-mail: kps@fdlawlv.com  
12 3275 South Jones Blvd., Suite 105  
13 Las Vegas, Nevada 89146  
14 Telephone: (702) 307-9500  
15 *Attorneys for Defendants STEVEN J.*  
16 *SUSOEFF and STEVE SUSOEFF, LLC*  
17 *dba Meritage Financial Group*

18 **ORDER**

19 IT IS SO ORDERED.

20 Dated: October 25, 2024

21   
22 United States District Judge  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE**

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,  
444 S. Flower Street, Suite 900, Los Angeles, California 90071  
Telephone No. (323) 965-3998; Facsimile No. (213) 443-1904.

On October 21, 2024, I caused to be served the document entitled **NOTICE OF PROPOSED SETTLEMENT AND STIPULATION AND ORDER TO VACATE SCHEDULING ORDER** on all the parties to this action addressed as stated on the attached service list:

☐ **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

☐ **PERSONAL DEPOSIT IN MAIL:** By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

☐ **EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

☐ **HAND DELIVERY:** I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

☐ **UNITED PARCEL SERVICE:** By placing in sealed envelope(s) designated by United Parcel Service ("UPS") with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

☐ **ELECTRONIC MAIL:** By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

☒ **E-FILING:** By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

☐ **FAX:** By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: October 21, 2024

/s/ Charles E. Canter

Charles E. Canter

***SEC v. Steven J. Susoeff, et al.***  
**United States District Court—Nevada**  
**Case No. 2:23-cv-00173-JCM-EJY**

**SERVICE LIST**

Kimberly P. Stein, Esq.  
kps@fdlawlv.com  
FLANGAS LAW GROUP  
3275 South Jones Blvd., Suite 105  
Las Vegas, Nevada 89146  
Phone: (702) 971-2258  
*Attorney for Defendants Steven J. Susoeff and Steve Susoeff, LLC*